



# California Fair Political Practices Commission

July 17, 1987

Gerard C. Danna  
Special Investigator  
Massachusetts State Ethics Commission  
McCormack State Office Building, Rm. 619  
One Ashburton Place  
Boston, MA 02108

Re: Your Request for Advice  
Our File No. I-87-156

Dear Mr. Danna:

Your letter of May 29, 1987, to Secretary of State March Fong Eu has been referred to this office for response. I am forwarding a copy of the Political Reform Act and the Commission's regulations on gifts (2 Cal. Adm. Code Section 18726-18726.8) with this letter. I hope they are useful. I am not certain what else, if anything, you may be interested in. If we can be of further assistance, please let me know.

Sincerely,

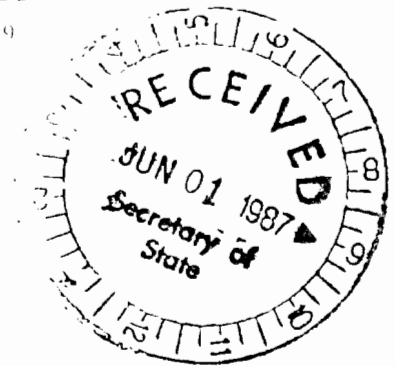
*Diane M. Griffiths*  
Diane M. Griffiths  
General Counsel

DMG:km  
Enclosures

7 P P  
JUN 4 1 36 PM '87

# The Commonwealth of Massachusetts State Ethics Commission

John W. McCormack State Office Building, Room 619  
One Ashburton Place, Boston 02108  
Telephone (617) 727-0060



May 29, 1987

Secretary of State's Office  
Political Reform Division  
1230 J Street  
Sacramento, CA 95814:  
Attn: March Long Fu, Program Mgr. and Secretary of State

Dear Mr. Fu:

Our office is presently involved in a number of investigations involving government officials who are receiving gratuities from bank officials with whom they conduct government business.

We are presently soliciting information from other ethics commissions around the nation pertaining to similar issues.

If your office has issued any advisories or adjudicatory decisions or if there is any relevant case law from your state court system, we would appreciate you forwarding copies to us. We additionally would appreciate a copy of any relevant sections of your statute.

We are most concerned with the issues of "substantial value" and the use of accrual of gratuities for enforcement purposes, as well as the defense of "business justification".

Your assistance in this matter will be greatly appreciated. If you have any questions please contact Attorney Robert Levite or Special Investigator Gerard Danna at (617) 727-0060.

Sincerely,

*Gerard C. Danna*

Gerard C. Danna  
Special Investigator

GCD:ph